

Exhibit B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR
MDL No. 3047

This Document Relates to:

[Insert Case Name and Number]

PLAINTIFF FACT SHEET – SCHOOL DISTRICTS
(SUPPLEMENTAL)

INSTRUCTIONS

Use of this fact sheet. Each school-district plaintiff that has filed a complaint in this action must complete this Plaintiff Fact Sheet. If more than one school district is a plaintiff on a single complaint, each individual school district must submit its own individual Plaintiff Fact Sheet. This Plaintiff Fact Sheet constitutes discovery responses subject to the Federal Rules of Civil Procedure. The information provided will only be used for purposes related to this litigation and may be disclosed only as permitted by the Protective Order entered in this litigation.

Terms used. “You,” “your,” “Plaintiff,” and “School District” as used throughout this fact sheet refers to the school district completing this form. “Social media” refers to Defendants’ social media platforms as described in your complaint.

Certification. In completing this Plaintiff Fact Sheet, you are representing that you are an authorized representative of the school district bringing the lawsuit. You must certify under oath that the information is true and correct to the best of your knowledge, information, and belief.

Instructions regarding requests for information. Do not leave any questions unanswered or blank; if you cannot recall all of the information requested, provide as much information as you can. You should insert additional space where necessary to answer the questions completely. You should consult with your attorney about completing this form. None of the requests are designed to require an expert evaluation or limit expert testimony. None of the requests are designed to require review of individual student records.

Instructions regarding document requests. For each question calling for the production of documents, indicate whether you possess any existing documents responsive to the request. A request will indicate where it only requires that you produce information that has already been compiled and/or exists in report, survey, analysis, study, or other document that provides an

1 overview of or describes the indicated topic. If information has not been compiled or summarized
2 on these topics, it does not need to be located, described, or produced for the purposes of this
3 Plaintiff Fact Sheet. For example, you are not required to locate, compile, sort, describe or produce
4 underlying records that might show, for example, the prevalence of student use of social media or
expenses incurred to address problems arising from student use of social media; however, you are
required to produce existing reports, surveys, analyses, studies, or other overviews on that topic.

5 To determine whether you have any responsive documents, you are required to investigate
6 whether you have the information sought. This investigation might involve a district employee
7 asking the appropriate person at each school to provide the district with documents or reports
responsive to the requests. You do not need to create any new documents.

8 If you do possess any such documents, reports, surveys, analyses, studies, or other overview
9 documents, then provide copies as they are kept in the ordinary course of business, without
identifying any student-specific data.

10 **I. CASE INFORMATION**

11 1. Plaintiff: _____

12 2. Name of the court in which the complaint was initially filed:
13 _____

14 3. Case number in court in which complaint was originally filed:
15 _____

16 4. Filing date of the complaint: _____

17 5. Named defendants in the complaint: _____

18 6. Name, firm, and e-mail address of the principal attorney(s) representing Plaintiff:
19 _____

II. SUPPLEMENTAL QUESTIONS

7. Identify, if separately itemized/tracked, and describe known expenditures and anticipated future expenditures made by your district, related to mental health and indicate whether you are seeking to recover the expense. Note: This question is not designed to require an expert evaluation or limit expert testimony.

8. Identify, if separately itemized/tracked, and describe known costs incurred or damages sought as a result of any harms to your district which you attribute to social media. Note: This question is not designed to require an expert evaluation or limit expert testimony.

9. Provide the number of students in your district referred for mental health services, if such referrals are tracked. Note: This question is not designed to require review of underlying individual student records.

Year	Number of Students
2023-2024	
2022-2023	
2021-2022	
2020-2021	
2019-2020	

1	2018-2019	
2	2017-2018	

4 10. Identify the number of and location of any school shooting, whether you attribute any
5 such incident to social media use, and if so, which social media platform(s).

6 _____
7 _____
8 _____
9 _____
10 _____
11 _____
12 _____

13 11. Identify the number of and location of any other violence perpetrated by an outsider (i.e.
14 non-student and non-staff member) which required a cessation of school activities for the
15 entire district or an entire school campus, whether you attribute any such incident to social
media use, and if so, which social media platform(s).

16 _____
17 _____
18 _____
19 _____
20 _____

21 12. Describe the frequency of threats of violence to any of your schools (e.g. threat of school
22 shooting or bomb scare) which required a cessation of school activities for the entire
23 district or an entire school campus and were known to students, whether you attribute any
such incident to social media use, and if so, which social media platform(s).

24 _____
25 _____
26 _____
27 _____
28 _____

13. Identify the number of staff or student suicides which your district reported to an outside entity and which were known to the student body, whether you attribute any such incident to social media use, and if so, which social media platform(s):

14. Identify the number of staff or student attempted suicides which your district reported to an outside entity and which were known to the student body, whether you attribute any such incident to social media use, and if so, which social media platform.

CERTIFICATION

I have made reasonable inquiries to answer the foregoing questions. Based on my personal knowledge and the information provided by other district employees, I declare under penalty of perjury that the information provided in this Plaintiff Fact Sheet is complete, true, and correct to the best of my knowledge and information, and that I have provided all of the requested documents that are reasonably accessible to me and/or my attorneys, to the best of my knowledge.

Signature

Date

Name (Printed)

Title